

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TERRENCE J. HANCOCK, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 20 C 5389
)	
DI'JON, INC., an Illinois corporation,)	JUDGE MARY M. ROWLAND
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on November 30, 2020 request this Court enter judgment against Defendant, DI'JON, INC., an Illinois corporation. In support of this Motion, Plaintiffs state:

1. On November 30, 2020, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for the time period April 2020 forward. The Court also entered an order that judgment would be entered after Plaintiffs' received the required contribution reports and determined the amounts due and owing from Defendant.

2. On or about March 9, 2021, Plaintiffs' counsel received Defendant's monthly fringe benefit contribution reports for the time period April 2020 through February 2021. These reports indicate Defendant is delinquent in contributions to the Funds in the total amount of \$30,646.04. (See Affidavit of Richard J. Clarson).

3. Additionally, the amount of \$6,129.22 is due for 20% liquidated damages and \$1,515.12 is due for interest. (Clarson Aff. Paras. 5, 6).

4. In addition, Plaintiffs' firm has expended \$485.00 for costs and \$1,498.75 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$40,274.13.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$40,274.13.

/s/ Cecilia M. Scanlon

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 2nd day of April 2021:

Mr. Dennis Michon, Registered Agent
Di'Jon, Inc.
15255 S. 94th Avenue, Suite 205
Orland Park, IL 60462

Ms. Diane Jacobi, President
Di'Jon, Inc.
3442 W. 198th Street
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/s/ Cecilia M. Scanlon

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